

**NEILCOR****RECEIVED****JUN 29 1993**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

June 29, 1993

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

**REF:** FCC Docket No. 93-61  
Amendment of Part 90 of the Commission's Rules to Adopt  
Regulations for Automatic Vehicle Monitoring Systems

Dear Ms. Searcy:

I am replying to the proposed changes to regulations referenced above on behalf of Nellcor Incorporated ("Nellcor"), a publicly-held company headquartered in Hayward, California.

Nellcor is a manufacturer of patient safety monitoring equipment, particularly pulse oximetry equipment, used widely in hospitals across the country. The vital signs which are monitored by our equipment are clinically significant and provide early warning of potentially life threatening conditions in critically ill patients.

One of the requirements in patient monitoring is the ability to display vital signs remotely at a nurse's station through telemetry. Towards this end, Nellcor has been developing over the last two years at a cost of over two million dollars, a telemetry system based on spread spectrum technology in the 902-928Mhz band to replace its existing telemetry system. This band is chosen specifically because we could develop a Part 15 radio which would be more robust in the environment of use.

We are not in favor of either allowing expanded use of the band by LMS operators or the removal of Part 15 devices from this band. The additional operations will at a minimum raise the noise floor or act as narrow band jammers. We could respond to this by increasing the power output of our radios, but this would most likely have a detrimental effect on other sensitive patient monitoring devices in the vicinity.

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# NEELCOR<sup>®</sup>

Telemetry will continue to be a key part of patient monitoring within hospitals and patient safety will continue to be our foremost concern. We urge you not to approve this change.

Sincerely,

**Neelcor Incorporated**

A handwritten signature in black ink, reading "David Schlotterbeck". The signature is fluid and cursive, with the first name "David" being more prominent and the last name "Schlotterbeck" following in a similar style.

David Schlotterbeck  
Executive Vice President/  
Chief Operating Officer

cc: C. R. Larkin, President/Chief Executive Officer  
J. Guardado, Vice President/General Manager  
L. DeBuono, General Counsel